

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

SANTOS FRANCIS MURCIA NAVARRO, §
INDIVIDUALLY AND AS NEXT FRIEND §
OF K.R.N., a Minor §
Plaintiffs §

CIVIL ACTION NO. 7:22-cv-0307

V. §

RUDY GARCIA & §
ISS ACTION, INC. §
Defendants §

NOTICE OF PENDING SETTLEMENT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES DEFENDANT, ISS ACTION, INC., (hereinafter “Defendant”), and SANTOS FRANCIS MURCIA NAVARRO, INDIVIDUALLY AND AS NEXT FRIEND OF K.R.N., a minor, (hereinafter “Plaintiffs”) and file this their NOTICE OF PENDING SETTLEMENT, showing unto this Court as follows:

1. The claims of Plaintiffs, SANTOS FRANCIS MURCIA NAVARRO, Individually and as next friend of K.R.N., a minor, against Defendant, ISS ACTION, INC. were resolved by agreement, pending tender of consideration, which is near completion.
2. The Parties anticipate that this settlement will be formally documented between them, finalized, approved and all remaining consideration tendered within one month, if not sooner. The Parties anticipate filing a Stipulation of Dismissal at such time.
3. The Parties respectfully request that this Court terminate all settings in the case as to all Parties pending the anticipated stipulation of dismissal or some unforeseen further notice to the contrary from the Parties.

4. The Parties agree and respectfully request that the Court waive the appointment of an attorney ad litem for the minor, K.R.N. No conflict of interest exists between minor and her parents and the appointment would only add to the cost of suit.
5. SANTOS FRANCIS MURCIA NAVARRO, Individually and as next friend of K.R.N., does not seek any individual recovery under this suit and requests that the Court waive the appointment of an attorney ad litem as there remains no possibility of conflict and to prevent further costs to suit.

Respectfully Submitted,

By: /s/ Miguel A. Saldaña
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OF COUNSEL:

**WALSH GALLEGOS TREVIÑO
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**ATTORNEY IN CHARGE FOR
DEFENDANT:**

ISS ACTION, INC.

By: /s/ Katie E. Payne
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OF COUNSEL:

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OF COUNSEL:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of April, 2023, a true and correct copy of the foregoing *Notice of Pending Settlement* was electronically filed with the Clerk of the Court using CM/ECF system and has been served on Plaintiffs' counsel of record, pursuant to Federal Rules of Civil Procedure as follows:

ATTORNEY FOR PLAINTIFFS:

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/s/ Miguel A. Saldaña
Miguel A. Saldaña